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Craig Puljan

From: Melora Shelton [meloras@gretteassociates.com]
Sent: Tuesday, October 16, 2007 12:01 PM
To: Craig Puljan
Cc: 'David Pierce'; matthewb@gretteassociates.com
Subject: Ash Grove dredge
Attachments: Scan001.pdf

Craig –

I was planning to put together a synopsis of where we are, and what our recommended approach was for moving forward, but before we do that I'd like to confirm a few things regarding the dredge (footprint/depth and therefore volume) and relay some information on the permit conditions associated with the previous permits.

I've cc'd David Pierce regarding the first, both for his information and for some clarification on exactly where the 910 cy (or 850 cy) came from.

Dredge Footprint/Depth

In looking through the permit materials I noticed that there are two different dredge footprints identified (2002, 2005 - see attached). **I need to confirm which one applies for this effort (or if it should actually be a subset of one of these), and also which one David used for his calculations.** My understanding was that the change between 2002 and 2005 was to account for the unanticipated spillage after the hopper replacement in 2002, so it would have been more likely that the 2002 footprint (or subsection thereof) would apply in this application, but perhaps not given the results of the bathymetry survey?

The original permit (2002) authorizes a dredge in the 120 ft by 30 ft area waterward of barge dolphins, and allows Ash Grove to take remove up to 600 CY of accumulated material down to -25 ft MLLW *as long as a 1-ft layer of aggregate is left between the bottom of the dredge cut and the native substrate of the river bed.*

The 2005 permit changed the dredge to the 45 ft by 65 ft area including the area underneath the support tower. This permit included dredging in much shallower areas, but still would have only authorized a dredge cut to -25 ft at the deepest *and with the 1-ft layer of aggregate remaining between the bottom of the dredge cut and the native substrate.*

We need to be able to define what the parameters (footprint, depths) are for this application and why. Based on my conversation with David, his calculations did not account for the 1-ft of remaining aggregate (that lessens the dredge volume by ~111 CY), and also includes dredging up underneath the support tower. If the shallower dredge action is not necessary in order to get safe barge berthing depths (i.e., if we can stay waterward of the dolphins, as was done in 2002), we may be able to come in under 600 CY. That would be ideal, because while we'd still need to address that there was more spillage than anticipated, we'd be within the permitted amounts.

In any case, we should plan on defining exactly where the dredge needs to be completed and

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confirm that whatever volume we're using applies only to that area.

Permit Conditions

So far as I can tell, in addition to the improvements outlined in the 2005 application (modifications of the conveyor, new covers over the conveyor, and new pre-cleaner and secondary cleaner systems), the Corps (and NOAA/USFWS) were anticipating *annual bathymetric surveys* to monitor for unanticipated spillage.

In addition to the above, the City of Seattle required that Ash Grove *check the conveyor skirting weekly* (and adjust appropriately) to ensure material is not being spilled before reaching the dock.

No reporting requirements were associated with these so far as I can tell, but if we need to permit for more than 600 CY (or even just upto 600 cy) Ash Grove will probably need to be prepared to respond to the question of whether the annual surveys were completed or not.

Craig, Matthew is out this AM and I want to get his feedback on the information you got from your folks at the plant, but I do think you and Eric on the right track with that. Being able to offer implementing some additional "monitoring" (barge logs), as well as offering some assessment of what may have happened, is probably much more to Ash Grove's advantage than letting the regulators come up with monitoring for you, plus it will demonstrate that you are aware of the problems associated with the spillage and desire to reduce it - that can only work in your favor.

Once we have a better sense of exactly what volume we need to pull in this dredge cycle, and in what area, Matthew and I will present our recommendations for moving forward. The best possible scenario is one where we can propose no more than 600 CY of dredge this year (less would be even better, but is probably not feasible).

I'm running out for lunch, but will be back in the office this afternoon.

Thanks!

-ms

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